

EXHIBIT C

Issued by the

UNITED STATES DISTRICT COURT

DISTRICT OF Delaware

Invamed, Inc.,

Plaintiff,

V.

Barr Laboratories, Inc., Brantford Chemicals
Inc., Bernard C. Sherman, Apotex Holdings,
Inc. Apotex, Inc., and Sherman Delaware, Inc.

SUBPOENA IN A CIVIL CASE

CASE NUMBER: 98 Civ. 0861 (RWS)
(Pending in the Southern District
of New York)TO: DuPont Pharmaceuticals Company
Chestnut Run Plaza, 974 Centre Road,
Wilmington, Delaware 19805
c/o Adam L. Hoefflich of Bartlit, Beck, Herman, Palenchar & Scott☐ YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

Winston & Strawn, 200 Park Avenue, New York, New York 10166

DATE AND TIME 10:00 a.m.
September 14, 2000☐ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

SEE ATTACHED RIDER

PLACE

Winston & Strawn, 200 Park Avenue, New York, New York

DATE AND TIME 9:00 a.m.
September 14, 2000☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons to consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

Attorney for Defendant, Brantford Chemicals, Inc.

Stacey Y. Dixon

DATE

August 31, 2000

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Stacey Y. Dixon, Lord, Bissell & Brook, 115 S. LaSalle St., Chicago, IL 60603 312/443-1882

(See Rule 45, Federal Rules of Civil Procedure Parts C & D on Reverse)

¹ If action is pending in district other than district of issuance, state district under case number.

R I D E R

A. Definitions

1. "Invamed" means Invamed, Inc.; its present and former affiliates, officers, directors, employees and agents, including but not limited to Apothecon.
2. "Coumadin®" means the branded pharmaceutical product which contains the chemical compound warfarin sodium as an active drug substance.
3. The terms "you" and "your" mean the natural persons and business, legal or governmental entities or associations responding to this document request.
4. "Defendants" mean Barr Laboratories, Inc., Brantford Chemicals, Inc. (f/k/a ACIC Canada Inc.), Apotex Holdings Inc., Apotex Inc., Sherman Delaware Inc. and Dr. Bernard C. Sherman; its/his/their affiliates, officers, directors, employees, agents and sales representatives (including but not limited to ACIC Fine Chemicals Inc.).

B. Instructions

1. You are requested to produce the originals of all documents called for herein, as well as any and all copies of documents which bear any mark or notation not present on the original.
2. You are requested to produce in redacted form documents which contain information subject to a privilege but which also contain non-privileged information responsive to these document requests.
3. Unless otherwise specified, this Subpoena calls for documents generated during, or containing information relating to, the period January 1, 1993 through the present.

C. Notice of Deposition Pursuant to Federal Rule of Civil Procedure 30(b)(6)

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Defendant Brantford Chemicals Inc. ("BCI"), by and through its attorneys, will take the deposition upon oral examination at Winston & Strawn, 200 Park Avenue, New York, New York on September 14, 2000 at 10:00 a.m., and continuing day to day thereafter until completed, of DuPont Pharmaceuticals Company ("DuPont") through the officers, directors, or other persons designated by DuPont as being the person(s) competent to testify on behalf of DuPont concerning the following matters listed below as to which examinations are requested. The deposition will be taken before an officer duly authorized by law to administer oaths and shall be recorded stenographically and by videotape.

Matters for Examination

1. The products against which Coumadin® competes.
2. The market share retained by Coumadin®, or the amount of market share gained by any generic warfarin sodium, after the introduction of generic warfarin sodium.
3. DuPont's plans, strategies and steps taken in connection with the marketing, advertising and promotion of Coumadin® from 1995 to the present, including but not limited to , marketing, advertising and promotion developed and implemented in response to the introduction of a generic warfarin sodium product.
4. DuPont's ability to develop and sell a generic version of Coumadin®.
5. Authentication of documents produced and foundation as business records.

D. Documents Requested

1. Documents sufficient to show the market in which Coumadin® or any generic warfarin sodium competes.
2. Documents sufficient to show either the amount of market share retained by Coumadin®, or the amount of market share gained by any generic warfarin sodium, after the introduction of generic warfarin sodium.
3. Documents sufficient to show DuPont's plans, strategies and steps taken in connection with the marketing, advertising and promotion of Coumadin® from 1995 to the present, including but not limited to, marketing, advertising and promotion developed and implemented in response to the introduction of a generic warfarin sodium product.

Dated: August 31, 200

BRANTFORD CHEMICALS, INC.

By: 

One of Its Attorneys

Hugh L. Moore (HM-7148)
Michael J. Gaertner (MG-4713)
Lord, Bissell & Brook
115 South LaSalle Street
Chicago, IL 60603